

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY DIVISION**

IN RE:	)	
RICHARD RANGEL and	)	
MICHELLE RANGEL	)	CASE NO. 09-92944-BHL-13
Debtors.	)	

**MOTION TO  
MODIFY CHAPTER 13 PLAN**

Now come the Debtors, Richard Rangel and Michelle Rangel, by counsel, David P. Allen and proposed to Modify their Chapter 13 Plan. In support of this Motion, counsel for the Debtor states as follows:

1. Debtors and their dependents have incurred post-petition medical expenses. They propose to include the following debts in their Chapter 13 Plan to be treated as unsecured non-priority claims:
  - a. Floyd Memorial Hospital, 1850 State Street, New Albany, IN 47150, Account # 3732471, Date of Service 1/22/2013, Balance \$359.97.
  - b. Floyd Memorial Hospital, 1850 State Street, New Albany, IN 47150, Account # 3718974, Date of Service 2/4/2012, Balance \$214.23.
  - c. Floyd Memorial Medical Group, PO Box 890728, Charlotte, NC 28289-0728, Account # 18871, Date of Service 8/2012-12/2012, Balance \$15.00
  - d. Floyd Memorial Medical Group, PO Box 890728, Charlotte, NC 28289-0728, Account # 217888, Date of Service 12/2012, Balance \$12.63.
  - e. Quest Diagnostics, PO Box 740810, Cincinnati, OH, 45274, Account #829260722, Date of Service 11/2012, Balance \$24.28
  - f. Quest Diagnostics, PO Box 740810, Cincinnati, OH, 45274, Account #8228223262, Date of Service 11/2012, Balance \$97.64.
2. That the modification proposed by the Debtors will not modify the rights of any secured claims being dealt with under the plan, and may modify the rights of only the holders of allowed Class B unsecured claims.

WHEREFORE the Debtors Richard and Michelle Rangel, by Counsel, move the Court to modify their Chapter 13 plan to include the above stated debts as unsecured, non-priority claims.

DATE: April 15, 2013

/s/ David P. Allen  
David P. Allen  
Attorney for Debtor  
P.O. Box 485  
Salem, IN 47167  
(812) 883-4171

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon Joseph M. Black, Jr. Chapter 13 trustee and the U.S. Trustee, 101 W. Ohio Street, Suite 1000, Indianapolis, IN 46204 either by electronic transmission or by depositing the same in the United States mail, First Class postage prepaid on April 15, 2013.

/s/ David P. Allen  
David P. Allen